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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: ZOOM VIDEO COMMUNICATIONS,
INC. PRIVACY LITIGATION

This Document Relates To:

All Actions

CASE NO. 3:20-cv-02155-LB

**DECLARATION OF MARK MOLUMPY
IN SUPPORT OF PLAINTIFFS' MOTION
TO EXPEDITE BRIEFING ON MOTION
FOR APPEAL BOND**

Judge: Hon. Laurel Beeler
Date: TBD
Time: TBD
Location: Courtroom B, 15th Floor

I, Mark C. Molumphy, declare that the following is true:

1. I am an attorney admitted to practice before this Court and a partner in the firm of Cotchett, Pitre & McCarthy, LLP, counsel for Plaintiffs in the action captioned I make this declaration of my own personal knowledge, and, if called to do so, could testify competently to the facts stated herein under oath.

2. I submit this declaration pursuant to Civil Local Rule 6-3 in support of Plaintiffs' Motion to Expedite Briefing. Good cause exists for an expedited schedule. If the Court does not expedite briefing on the Bond Motion, Plaintiffs will be forced to continue to incur substantial costs responding to the frivolous appeal, as well as the resulting administrative costs, without any assurance that they will be able to recover those costs if the appeal is denied. Because Local Rule 7-2 requires all motions to be noticed for hearing no less than 35 days after the filing of the motion, the earliest date that Plaintiffs' Bond Motion could be heard is April 27, 2023. Plaintiffs respectfully request that Gonzalez not be allowed to draw this matter out to that date and beyond without being required to post an appeal bond.

3. The following time modifications have previously been ordered this case:

Date	Docket No./Case No	Description
02/23/2021	Dkt. No. 162 20-cv-02155-LB	Stipulation to Extend Class Certification Deadlines filed by Plaintiffs
4/08/2021	Dkt. No. 177 20-cv-02155-LB	Stipulation to Extend Case Deadline filed by Zoom Video Communications, Inc
05/13/2021	Dkt. No. 181 20-cv-02155-LB	Order granting in part and denying in part 178 Stipulation to Extend Case Deadlines filed by Zoom Video Communications, Inc.
06/17/2021	Dkt. No. 187 20-cv-02155-LB	Order granting in part and denying in part 186 Stipulation to Extend Case Deadlines filed by Zoom Video Communications, Inc.
07/21/2021	Dkt. No. 189 20-cv-02155-LB	Order granting in part and denying in part 188 Joint Stipulation and [Proposed] Order to Extend Case Deadlines filed by Plaintiffs

4. This modification would not affect any other matters in this case, as currently the only pending motion in this Court is Plaintiffs' motion for appeal bond.

I declare under penalty of perjury under the laws of the United State that the foregoing is true and correct, and that this declaration was executed on this 10th day of March, 2023 at Burlingame, California.

/s/ Mark C. Molumphy
Mark C. Molumphy